

Commonwealth of Kentucky  
Division for Air Quality

***PERMIT STATEMENT OF BASIS***

Federally Enforceable Conditional Major  
U.S. Smokeless Tobacco Manufacturing Limited Partnership  
Hopkinsville, Kentucky.  
January 23, 2006  
Esmail Hassanpour, Reviewer  
Plant I.D. # 21-047-00055  
Application Log # 56290  
Permit #: F-01-030 R3

**DESCRIPTION:**  
**REVISION 1**

U.S. Smokeless Tobacco Manufacturing, Limited Partnership proposes a significant revision to their conditional major permit number F-01-030 issued to the facility in Hopkinsville, Kentucky. The source plans to add two fluidized-bed dryers to its processing lines. The new dryers will have higher hourly and annual emissions than the existing. The source is taking self-imposed limits to preclude the applicability of Title V requirements

**MINOR PERMIT REVISION FOR INCREASE USAGE OF FUMIGANT- REVISION 2**

U.S. Smokeless Tobacco Manufacturing Limited Partnership applied to the Division for Air Quality in January 28, 2004 to add three laboratory fume hoods for physical/chemical analyses and increase usage of Phosphide Fumigant for insect control in tobacco warehouses. The source proposes an increase in the usage rate of pesticide from 795 to 1590 pounds per year for insect control in the three tobacco warehouses. The current fumigant contains 55 percent aluminum phosphide however, the source request alternative use of pesticide which contains 56 percent magnesium phosphide. The source projects emission of 0.333 pound phosphine gas per pound of solid pesticide used for either aluminum or magnesium phosphide. Current permit usage rate is 800 pounds pesticide per warehouse application, and 88.3 pound of phosphine gas per warehouse in a year. The hours of operation and the pesticide fogging solution will not change from the existing permitted level (See emission/operating cap description). The three laboratory fume hoods for chemical and physical analyses have been added to the insignificant list, and there are no emissions from these fume hoods. Screen 3 analyses done on total phosphate gas shows that it's below the preliminary remediation goal (PRG) limits (See attachment).

**MINOR PERMIT REVISION FOR INCREASE USAGE OF FUMIGANT- REVISION 3**

U.S. Smokeless Tobacco Manufacturing Limited Partnership applied to the Division for Air Quality in July 29, 2004 to increase in usage rate of pesticide from 1590 to 3000 pounds per year. This will increase the total amount of Phosphine gas emission to 0.4995 ton per year. This will not increase emission of VOC source wide. Based on the MSDS sheet submitted to the Division there would be not health effects to the locality from the increase in the application of the fumigant.

**REGULATION APPLICABILITY:**

401 KAR 59:015, New Indirect Heat Exchangers.  
401 KAR 59:010, New Process Operations.  
401 KAR 63:020, Potentially hazardous matter or toxic substance:

**COMMENTS:**

Source wide emissions for Particulate Matter, (PM) and Volatile Organic Compounds (VOC) shall not exceed the respective limitations specified in the permit.

Compliance with annual emissions and processing limitations imposed pursuant to Section 1b of the material incorporated by reference in 401 KAR 52:030, Section 26, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

In accordance with Regulation 401 KAR 52:030, Section 10, incorporating the standard requirements reference material Section 1b, source wide emissions for Particulate Matter (PM) and Volatile Organic Compounds (VOC)] shall not equal or exceed 89.9 tons per year on a consecutive twelve (12) month total.

Generator operations shall not equal or exceed the agreed limitation of 500 hr/yr.

The permittee shall adhere to the potential emissions limitations specified in the permit.

**EMISSIONS AND OPERATING CAP DESCRIPTION:**

The source has the potential to be a major source for PM, NO<sub>x</sub> and VOC emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 100 tons per year. The source is limiting generator operations to 500 hours per year. In addition, the source is limiting the leaf operations and drying operations (source units 101, 102, 103, 201 and 202) to 4650 hours per year. The indirect heat exchangers will run for 8760 hours per year, and the application of pesticide fogging solution will not exceed 1440 gallons/year and 576 hours/year. This will limit the potential emissions source-wide for PM and VOC below 90 tons per year, to preclude the applicability of Title V requirements. Also, the permittee is limiting emissions from individual hazardous air pollutants (HAPs), to less than nine (9) tons per year. The operation and the application of solid fumigant pesticide source wide shall not exceed 3000 pounds/year and 288 hour/year respectively. Application per warehouse should not exceed 800 lb.

**CREDIBLE EVIDENCE:**

This permit contains provisions, which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212;

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40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.